GARLAND CREOSOTING (GREGG COUNTY)

**TEXAS** 

EPA ID# TXD007330053 Site ID: 0601644 EPA REGION 6
CONGRESSIONAL DISTRICT 1

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# **Background**

The Garland Creosoting Superfund Site (CERCLIS ID TXD007330053) is located in Longview, Gregg County, Texas on 12 acres at 3915 Garland Road in Longview, Texas. The Site is bounded by Garland Road to the east, State Highway 149 to the west, industrial facilities to the north, and industrial facilities, wooded land, and homes to the south. An intermittent creek runs east to west through the southern portion of the property.

Garland Creosoting is currently inactive and has been abandoned since bankruptcy proceedings in 1997. The nearest residences are located approximately one mile south of the Site across the unnamed intermittent creek. State Highway 149 borders the western edge of the Site while light industry borders the Site to the north and south. Texas Eastman Company's wildlife refuge is located east of the Site. The Site is surrounded by an 8 foot chain-link fence, which has locking gates to restrict access to the Site. Based on conversations with officials of the City of Longview, the most likely future land use of the area surrounding the Site is high intensity retail business. Therefore, the mostly land use for the Site is commercial/industrial.

Garland Creosoting began manufacturing creosote-treated wood products in 1960 and continued operations until declaring bankruptcy in February 1997. Six tanks were used to recycle waste creosote and waste generated during the wood preserving process. The waste from the tanks was placed in one of five unlined surface impoundments. Downgradient of the five impoundments was a sixth impoundment, which was used as a containment pond in the event of a release from the wastewater treatment process. Garland Creosoting discontinued using the impoundments in 1985 and began discharging wastewater, by permit, to the City of Longview's wastewater collection and treatment system.

In 1986, Garland Creosoting was required by the Texas Water Commission (now TCEQ) to close impoundments 1 through 5. Creosote-contaminated ground water, found during a series of subsurface investigations, resulted in the installation of 12 ground water monitoring wells between 1985 and 1989. Dense non-aqueous phase liquid (DNAPL) was identified in 5 of the 12 wells. Because of the ground water contamination, the impoundments were closed as landfills in November 1989. The water was removed from the impoundments, and the creosote sludges and contaminated soil were capped in place. In June 1990, Garland Creosoting was issued a permit for post-closure care of the closed impoundments. A separate corrective action program was implemented under the closure permit to address the ground water contamination. The corrective action was implemented through a Compliance Plan incorporated into the post-closure permit. This Compliance Plan authorized Garland Creosoting to install, operate, and monitor a ground water recovery system to address contamination. A ground water recovery trench (French Drain) was installed along impoundments 1 through 5. The passive collection system channeled dissolved and free-phase creosote to a sump; the contents were pumped to the wastewater treatment system. When Garland Creosoting declared bankruptcy in 1997, the ground water treatment system was shut down.

### Current Status

- EPA selected the final remedial action in the Record of Decision (ROD), which was signed by EPA on September 15, 2006.
- EPA's RD contractor conducted field investigations during November and December 2007 to provide information for the RD. The Final RD was approved on May 1, 2009.
- Remedial Action activities commenced in November 2009. On August 12, 2010, EPA certified that the site is "Construction Complete".
- Long Term Recovery Action (LTRA) consists of collecting leachate from two Interceptor/Collector Trenches, and treating the leachate in an on-site Wastewater Treatment Plant prior to discharge. LTRA will continue for at least 10 years.
- This site has been funded by the American Recovery and Reinvestment Act (ARRA). Approximately \$5.9 million has been awarded to EPA's Prime Contractor (EA Engineering Science and Technology). The Garland project had a total of 1,149.75 EA hours associated with this quarter's reporting period. EA divided the total of 1,149.75 hours by 520 hours/FTE to obtain 2.21 FTE. The types of jobs created or retained during this quarter included the following: senior civil engineers, mid-level civil and environmental engineers, junior environmental engineers, senior and junior environmental scientists, contract specialists, administrative accounting assistants, administrative assistants/secretaries, cost control and scheduling specialists, environmental field technicians, CADD/GIS technicians, site construction manager, and project manager.
- The main subcontractor (EQM) had a crew of 10 personnel working at the site full time. Other subcontractors (surveyors and geotechnical technicians) have 4 personnel working at the site on a part time (as-needed) basis.
- ARRA funding has created at least 16 jobs at the Garland Creosoting Superfund site.

### Benefits -

Installation of two interceptor collector trenches (ICT) and a ground water treatment system prevents the movement of contaminated ground water into an intermittent creek.

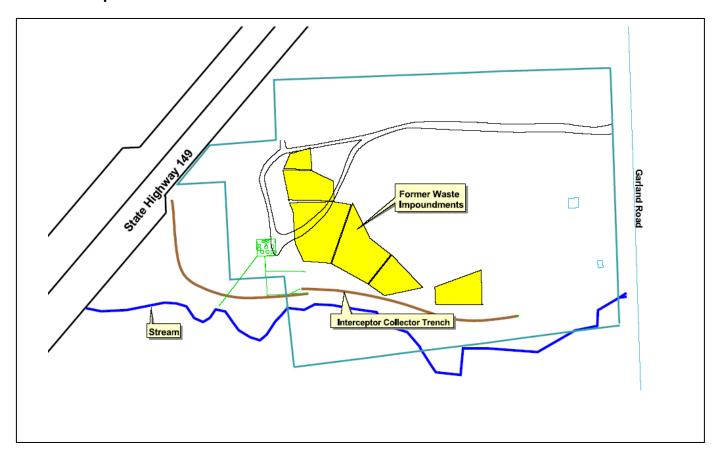
# National Priorities Listing (NPL) History -

NPL Proposal Date: July 22, 1999 NPL Final Date: October 22, 1999

**Population:** An estimated 116 people live within one mile of the Site.

## Setting:

- The site, which was used for manufacturing creosote-treated wood products, covers approximately 12 acres.
- The site is bounded by an industrial facility to the north, Garland Road to the east, a stream to the south, and State Highway 149 and undeveloped property to the west.
- An intermittent stream, which flows through the southwestern corner of the site, runs downstream approximately 1/3 mile where it meets Iron Bridge Creek. Approximately 1 3/4 miles downstream from its confluence with the intermittent creek, Iron Bridge Creek flows into the Sabine River.



### Wastes And Volumes -

Prior to 1985, wood preserving wastewater generated by the Garland Creosoting facility was treated and discharged to five surface impoundments for evaporation. The creosoting process produced creosote waste, which is a listed hazardous waste. Therefore, the bottom sludges created in the surface impoundments are classified as hazardous waste. A sixth impoundment was used for containment in the event of a spill from the process area or wastewater treatment plant.

Free-phase product, believed to be creosote, has been identified based on results from a subsurface investigation. Semivolatile organic compounds identified in the ground water include naphthalene, dibenzofuran, fluorene, phenanthrene, and phenol.

### **Health Considerations** -

The major chemicals present in creosote that can cause harmful effects are PAHs, phenol and cresols.

# Record of Decision (ROD) -

The ROD was signed by EPA on September 15, 2006

The ROD set forth the selected remedy for the Site, which involved actions to address creosote contamination in soil and ground water. The selected remedy is a comprehensive approach for the Site and addresses all current and potential future risks caused by soil and ground water contamination. Institutional controls will also be implemented to ensure future redevelopment of the Site is consistent with the long-term management of the waste contained at the Site and the acceptable risk levels remaining in the onsite soils and ground water. The major components of the selected remedy include:

#### Excavation and Containment of Soil

Excavation of contaminated soil exceeding the remedial goals and containment in an on-site Resource Conservation and Recovery Act (RCRA) containment cell

## Installation of Ground Water Recovery Wells

Installation of ground water recovery wells to remove ground water contaminated with volatile organic compounds. The extracted ground water will be treated using the existing ground water treatment system.

## Continued Operation of the Interceptor Collector Trenches (ICTs)

Operation of the ICTs to remove dense non-aqueous phase liquid (DNAPL) and contaminated ground water. The DNAPL is sent off-site for disposal at an approved hazardous waste disposal facility while the ground water is treated using the existing ground water treatment system. The ground water is treated to levels that permit the treated water to be discharged to an intermittent creek running along the southern edge of the property.

#### Monitored Natural Attenuation

Monitored natural attenuation (MNA) combines ground water sampling for contaminants and indicator parameters with data analysis and remedy evaluation. At the Garland Creosoting Site, MNA will include sampling of monitoring wells and evaluation of the ground water plume to monitor migration of the plume and ensure natural biodegradation processes are occurring. Wells will be selected during the design phase for monitoring to evaluate natural attenuation rates and demonstrate plume stability.

### • Technical Impracticability Waiver

Due to the presence of DNAPL and dissolved polycyclic aromatic hydrocarbons (PAHs) in the shallow water bearing zone, restoration of the PAH-contaminated ground water to its beneficial uses is technically impracticable within a reasonable time frame. Thus, a Technical Impracticability (TI) waiver to waive the maximum contaminant levels (MCLs) and ground water PRGs for the potential drinking water source is included as a component of the selected remedy. A TI zone (TIZ) for the contaminated ground water defines the area over which the TI waiver applies. A ground water monitoring program will be set up to verify that the PAH-contaminated ground water is managed within the TIZ.

### • Placement of Institutional Controls

In order to further protect human health and prevent future ground water use from the shallow water bearing zone, EPA will implement institutional controls (ICs) at the site. ICs will be implemented to restrict the future use of the Site to commercial/ industrial land use. ICs will also be implemented for the TIZ to restrict future ground water use. If the owner of the

affected property is unable or unwilling to implement a deed restriction in accordance with applicable state rule, the state will implement a deed notice in accordance with applicable state rule. During the performance of routine ground water monitoring activities at the Site, a Site evaluation will be conducted to ensure that there is no use of the contaminated ground water.

### Site Contacts -

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